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15	UNITED STATES DISTRICT COURT	
16	OF NORTHERN DISTRICT OF CALIFORNIA	
17	SAN FRANCISCO DIVISION	
18		
19	IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION	No. 3:23-md-03084-CRB
20		DECLARATION OF ELLYN H. HURD IN
21		SUPPORT OF PLAINTIFFS' MOTION TO EXCLUDE EXPERT TESTIMONY
22		-
23	This Document Relates to:	
24	Jaylynn Dean v. Uber Techs., Inc., No. 23-cv-06708	
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DECLARATION OF E. HURD IN SUPPORT OF PLS.' OMNIBUS DAUBERT MOT. Case No. 3:23-MD-3084-CRB

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## **DECLARATION OF ELLYN H. HURD**

I, Ellyn H. Hurd, declare as follows:

- 1. I am a partner of Simmons Hanly Conroy, LLP, an attorney licensed in the State of Massachusetts, and duly admitted to practice before this Court *pro hac vice*, representing Plaintiffs in the above caption action. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.
- 2. Attached hereto as **Exhibit A** is a true and correct copy of the expert report of Joseph Okpaku dated September 26, 2025.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of the deposition of Joseph Okpaku dated November 5, 2025.
- 4. Attached hereto as **Exhibit** C is a true and correct copy of the expert report of Vida Thomas dated September 26, 2025.
- 5. Attached hereto as **Exhibit D** is a true and correct copy of the expert report of Jason Morris dated September 26, 2025.
- 6. Attached hereto as **Exhibit E** is a true and correct copy of the expert rebuttal report of Jason Morris dated October 24, 2025.
- 7. Attached hereto as **Exhibit F** is a true and correct copy of the expert report of Eric Piza dated September 26, 2025.
- 8. Attached hereto as **Exhibit G** is a true and correct copy of the deposition of Eric Piza dated October 30, 2025.
- 9. Attached hereto as **Exhibit H** is a true and correct copy of the expert rebuttal report of Christopher Wilson dated October 24, 2025.
- 10. Attached hereto as **Exhibit I** is a true and correct copy of the expert report of Vicotira Stodden dated September 26, 2025.
- 11. Attached hereto as **Exhibit J** is a true and correct copy of the expert rebuttal report of Victoria Stodden dated October 24, 2025.
- 12. Attached hereto as **Exhibit K** is a true and correct copy of the deposition of Victoria Stodden dated October 21, 2025, and Exhibit 2073 to the deposition of Victoria Stodden.

- 13. Attached hereto as **Exhibit L** is a true and correct copy of the deposition of John Chandler dated November 7, 2025.
- 14. Attached hereto as **Exhibit M** is a true and correct copy of the expert rebuttal report of John Chandler dated October 24, 2025.
- 15. Attached hereto as **Exhibit N** is a true and correct copy of an excerpt of Exhibit 1047 (Uber's 2017-18 US Safety Report) to the deposition of Lizzie Ross dated June 11, 2025.<sup>1</sup>
- 16. Attached hereto as **Exhibit O** is a true and correct copy of Exhibit 1115 (Uber's 2019-20 US Safety Report) to the deposition of Gregory Brown dated June 17, 2025.
- 17. Attached hereto as **Exhibit P** is a true and correct copy of Exhibit 618 (Uber's 2021-22 US Safety Report) to the deposition of Roger Kaiser dated April 22, 2025.
- 18. Attached hereto as **Exhibit Q** is a true and correct copy of the expert report of Veronique Valliere dated September 26, 2025.
- 19. Attached hereto as **Exhibit R** is a true and correct copy of the expert report of Lacey Keller dated September 26, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th day of November, 2025, in West Dennis, Massachusetts.

/s/ Ellyn H. Hurd Ellyn H. Hurd

Due to file size, Plaintiffs have excerpted the relevant portions of this document and can provide the

full document should the Court need it.